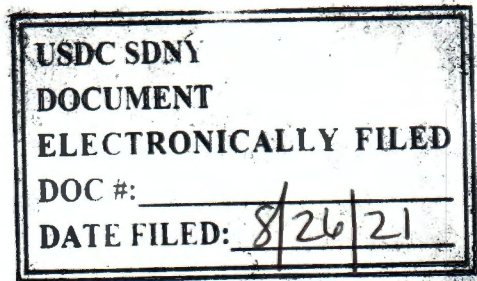


ORIGINAL



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CZIGANY BECK, individually and on
behalf of others similarly situated,

Plaintiff,

1:20-cv-03229-LLS

-against-

MANHATTAN COLLEGE,

Defendant.
-----X

PLAINTIFF'S OPPOSED MOTION TO APPOINT INTERIM CLASS COUNSEL

Plaintiff Czigany Beck hereby submits and moves this Court for an Order appointing Roy T. Willey, IV and Eric M. Poulin of Anastopoulo Law Firm, LLC as lead interim class counsel under Rule 23(g)(3) of the Federal Rules of Civil Procedure and Edward Toptani of Toptani Law PLLC as interim liaison class co-counsel.

As further set forth in the supporting memorandum, Plaintiff has shown that undersigned counsel are experienced, qualified, and capable of adequately representing the interest of the Classes.

WHEREFORE, for the reasons set forth above, and those set forth in the accompanying Memorandum of Law, Plaintiff prays for an order appointing the undersigned attorneys as lead interim class counsel.

Denied, without prejudice, as premature. No class has been certified, and no motion for certification has been made, despite Rule 23(c)(1)(A). The Advisory Committee note on the 2003 Amendment remarks that the then new subdivision (g) [signature block on the following page] to which plaintiff refers will "guide the court in assessing proposed class counsel as part of the certification process."

So Ordered.

Louis L. Stanton 8/26/21

MEMO ENDORSED

MEMO ENDORSED

Dated: September 22, 2020

Respectfully submitted,

By: /s/ Roy T. Willey, IV
Roy T. Willey, IV (*Pro Hac Vice*)
Eric M. Poulin (*Pro Hac Vice*)
ANASTOPOULO LAW FIRM, LLC
32 Ann Street
Charleston, SC 29403
843-614-8888
roy@akimlawfirm.com

-AND-

Edward Toptani
TOPTANI LAW PLLC
375 Pearl Street, Suite 14106
New York, NY 10038
212-699-8930
edward@toptanilaw.com

ATTORNEYS FOR PLAINTFF